## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF VIRGINIA ROANOKE DIVISION

UNITED STATES OF AMERICA

v.

Case No. 7:24MJ25

STEPHEN KARL JOHNSON

# **AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Tyler Bray, hereby depose and state the following:

#### INTRODUCTION AND AGENT BACKGROUND

- 1. I make this affidavit in support of a criminal complaint under Rules 3 and 4.1 of the Federal Rules of Criminal Procedure.
- 2. I am a Task Force Officer with the Federal Bureau of Investigation, assigned to the Richmond Division of the FBI, Roanoke Resident Agency. I have been so employed since October 2022. As such, I am a "federal law enforcement officer" within the meaning of Fed. R. Crim. P. 41(a)(2)(C), that is, a government agent engaged in enforcing federal criminal laws and duly authorized by the Attorney General to request a search warrant.
- 3. In addition to being an FBI Task Force Officer, I am also a sworn Police Officer II with the Virginia Tech Police Department. In my capacity as a Task Force Officer and Police Officer, I have requested search warrants, executed search and arrest warrants, and participated in numerous investigations of federal and state criminal law.
- 4. The information contained in this affidavit is based on my personal knowledge of, and involvement in, this investigation as well as other facts and information provided to me by other law enforcement officers involved in this investigation. I am familiar with the information contained in this affidavit through personal exposure to the

records and reports, and through discussions with other law enforcement personnel. The facts compromising the basis for this affidavit are true and correct to the best of my knowledge. I have not included all facts determined during this investigation in this affidavit, but only those facts necessary to establish probable cause.

5. Based on my training, experience, and the facts set forth in this affidavit, I submit that there is probable cause that Stephen Karl JOHNSON transmitted threats to injure in interstate or foreign commerce, in violation of 18 U.S.C. § 875(c).

#### PROBABLE CAUSE

- 6. Snapchat is an online messaging application that permits users to send pictures and video ("snaps") to other users by means of the Internet.
- 7. Snapchat allows users to join school "communities," which are comprised of students. In order to join a student "community" on Snapchat, a user must have an email issued by the relevant educational institution.
- 8. On or about February 21, 2024, several threatening messages were posted to a Snapchat group ("PHH2025") used by students at Patrick Henry High School in Roanoke, Virginia.
- 9. User "unknown248946" posted a "snap" picture at approximately 4:55 pm: "Im done bro fr on some real shit I'm pulling up to school with a ak and any kid I see that's in my sight I shooting fr."
- 10. A different user account, "Yorkie245886," posted in a different Snapchat group for Patrick Henry High School ("PHH 2026") at 7:12 pm: ""Yall think we playing ya'll done tomorrow its going to get very messy or should I say bloody."

- 11. At 7:52 pm, a third user account, "yomoiser," posted more threats: "We are serious we are coming to school and terrorizieing kids hope ya'll are ready to say love you to mommy," followed by a laughing emoji. The same user made a second post four minutes later, stating "yall dead tomorrow its going to be fun watching boom boom screaming," followed by an emoji. At 8:26 pm, "yomoiser" posted again: "When I get off the bus the driver is gone and the kids on it so hopefully ya'll are not on my bus."
- 12. Law enforcement contacted Snapchat's emergency response team. Snapchat provided information about user "unknown248946." The account was registered using a Google email address, straightfro79@gmail.com. Notably, Snapchat user data showed several recent display name changes associated with the account, which included "Yorkie," "Patrick" and "Stephen Johnson."
- 13. Snapchat also provided information about user "yomoiser." The Gmail email address associated with this account was the same one used for "unknown248946." And the display name for the account had been changed on February 22, 2024 from "Stephen Johnson" to "King."
- 14. Both of these Snapchat accounts were also associated with student email addresses from Roanoke City Public Schools. One account belonged to a tenth grader at Patrick Henry High School; the other belonged to a second grader at an elementary school. Law enforcement does not have reason to believe that either of these individuals are involved in making threatening conduct. Rather, it appears that student email addresses were used in order to access the relevant Snapchat school "communities."
- 15. Google provided information voluntarily in response to an emergency disclosure request as to straightfro79@gmail.com. Google's information showed that the

name associated with the email address was Stephen Johnson. A recovery phone number associated with the account was (540) 467-5747. A recovery email address associated with the account was johnsonstephenkarl@gmail.com.

16. Roanoke police have previously encountered Stephen Karl JOHNSON, who has a felony criminal record and a documented history of mental illness. In at least one earlier encounter, JOHNSON's phone number was listed as (540) 467-5747. This is the same phone number associated with straightfro79@gmail.com, which is in turn associated with multiple Snapchat accounts used to transmit threats.

17. JOHNSON was arrested on February 22, 2024 on state felony charges stemming from this incident. He is currently in state custody.

### **CONCLUSION**

18. Based on the foregoing, I submit that there is probable cause to believe that on February 21, 2024, Stephen Karl JOHNSON knowingly transmitted in interstate commerce a threat to injure the person of another, in violation of 18 U.S.C. § 875(c). I request that the Court issue an arrest warrant for JOHNSON pursuant to Fed. R. Crim. P. 4.

TYLER L. BRAY

Task Force Officer

Federal Bureau of Investigation

Sworn and subscribed to me by telephone this <u>22nd</u> day of February, 2024.

C. KAILANI MEMMER

United States Magistrate Judge

Cllm